

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
San Francisco Division

BRENDA HILL, et al.,  
Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,  
INC., et al.,  
Defendants.

Case No. 10-cv-02833-LB

**ORDER**

Re: ECF No. 255

The next issue is Mr. Friedman’s request for a protective order so that he may share protected information with consultants or witnesses. (*See* Motion, ECF No. 255.<sup>1</sup>) Kaiser opposes the proposed order as insufficiently tethered to an identified need. (Opposition, ECF No. 258.)

The main issues are entitlement to fees (through fee agreements or otherwise) and the reasonableness of fees and rates, all illuminated through declarations and exhibits. (*See, e.g.,* Order, ECF No. 236 at 20; Order, ECF No. 249 at 2.) It might be that Mr. Friedman needs to share confidential information in aid of his motion or perhaps more so with his reply.

The court attaches its standing order, which describes its procedures for resolving discovery disputes. The court is confident that on their own, the parties can devise a protective order (or use

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<sup>1</sup> Citations are to the Electronic Case File (“ECF”); pin cites are to the ECF-generated page numbers at the tops of the documents.  
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1 the court's model protective order at <http://www.cand.uscourts.gov/model-protective-orders>) to  
2 fashion appropriate safeguards to address Kaiser's concern about disclosure to lawyers or others  
3 adverse to it in litigation. Mr. Friedman will need to identify what he wants to disclose, and it  
4 seems likely that he needs to identify who he wants to disclose it to given the issues that Kaiser  
5 identifies.

6 **IT IS SO ORDERED.**

7 Dated: January 29, 2016



8 LAUREL BEELER  
9 United States Magistrate Judge